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Greater Cambridge Local Plan First Proposals

Cambridge Biomedical Campus – Policy S/CBC

Note & Comment

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Introduction

The Association's response to the Greater Cambridge Local Plan "First Proposals" strongly opposed the proposal that "An additional area adjoining Babraham Road is identified as a potential area to be released from the Green Belt specifically to meet the long-term needs of the Campus" subject to six conditions being met. "Additional" means in addition to the "continuing existing allocations" for the Cambridge Biomedical Campus (CBC) in the current Local Plan. This proposal – for area S/CBC/A – derives from the two councils' preliminary conclusion that "... it may be possible to demonstrate a case for exceptional circumstances to release land from the Green Belt in this location...". [Local Plan First Proposals, pages 85-90]

This note is in two parts. The first part follows up the answer given by an officer of the Greater Cambridge Shared Planning Service to an Association question at the Cambridge City Council South Area Committee meeting on 29 November 2021, about the rationale for the proposed extension to the CBC – Policy S/CBC. Our question is shown in the *Annex* at the end of this note. In answer, we were referred to the Development Strategy Topic Paper, which has now been thoroughly assessed. This first part consists of relevant extracts from the Topic Paper with TRA notes/comments interspersed, and includes an assessment of whether the national planning policy "exceptional circumstances" test for development in the Green Belt is met. The second part of the note assesses whether "other reasonable options" exist: national policy requires that "all other reasonable options for meeting its identified need for development" must be assessed and found wanting before development is proposed in the Green Belt.

Our conclusion is on the next page - and, for convenience, repeated at the end.

Prepared by David Plank

For Trumpington Residents' Association

Conclusion

The need for another extension of the CBC within the period of the new Plan has not been established. The Plan period runs to 2041 and, at the rate of development over the last thirteen years, there is up to twenty-one years' supply available within the Campus's existing land allocations according to the two councils' assessment.

Removing this land would cause "high harm" to the Green Belt according to the councils' own assessment. The councils have not shown that there are exceptional circumstances which justify removal of the land, as national planning policy requires. Their preferred development strategy excludes development in the Green Belt as unnecessary as well as harmful. There is a surplus of employment land, and housing needs can be met without development in the Green Belt. It is doubtful that correct application of the "Calverton" legal test would uphold a case for exceptional circumstances where the councils' strategic conclusion is that development in the Green Belt for employment and housing purposes is not necessary and they prefer other strategic options for development in the new Plan. The councils and the Campus have not assessed the "other reasonable options" that exist to meet the Campus's needs, nor have the councils taken account of the irretrievable loss of high value agricultural land the proposal would entail, contrary to their own policy (J/AL). The site-specific justification for exceptional circumstances to allow development in the Green Belt on the edge of Cambridge in the sole instance of the Campus is insubstantial and unconvincing.

If it can be shown that there is a need for development of the CBC within the period of the new plan, "other reasonable options" do exist as the two councils' own employment land assessment shows – as listed in Part Two of this note.

Proposed Policy S/CBC should not be included in the new Plan unless the need for it within the period of the plan is clearly established AND all other reasonable options have been fully assessed and found wanting for good reason by the two councils and the CBC. The Association's conclusion is that such an assessment will identify reasonable options which would live up to and enhance the Campus's international reputation – and increase its contribution to Greater Cambridge rather than diminishing it, as use of yet more Green Belt land would do.

Successful collaborations in the life sciences exist between activities at a significant distance from each other. They do not have to be together at great cost to the Green Belt separation between Cambridge and its necklace of villages which successive local plans have stressed is key to Cambridge's "special character". Much of the land taken out of the Cambridge Green Belt in the 2006 Local Plan was in the "Southern Fringe", a significant proportion of which was for the Cambridge Biomedical Campus. Yet more land for the CBC was removed from the Green Belt in the current 2018 Local Plan. Enough is enough. Other reasonable options exist which should be pursued to the exclusion of yet more land from the greatly valued Green Belt that remains.

PART ONE

“exceptional circumstances”

The justification for the proposed extension to the CBC given in the Development Topic Strategy Paper, in its own words, is as follows – shown in quotation marks. TRA comment is shown distinctly in [brackets].

Development Strategy Topic Paper

EXTRACTS relevant to the Cambridge Biomedical Campus

“2.4 Context Summary

“Our aims” include:

- “Jobs: Encourage a flourishing and mixed economy in Greater Cambridge which includes a wide range of jobs, while maintaining our area’s global reputation for innovation.” [page 15]

“Employment Land Review...

The work concluded that the Greater Cambridge economy is dynamic and does not readily align with national or regional forecasts for jobs growth. In particular it has a world renowned life sciences cluster which has the potential to drive growth beyond typical regional or national rates...” [page 20]

“5.3... The Employment Land Review identifies Greater Cambridge’s most significant economic clusters:

- Life sciences...
- Information Technology and Communications...
- Professional services and knowledge intensive services...
- High Tech/Advanced Manufacturing...” [page 26]

“5.5 Conclusion

“In planning positively for growth, and *notwithstanding the substantial overall oversupply in employment land*, it is appropriate that the new plan provides new land for the identified undersupply in particular types of employment... This is particularly the case for B1 needs where there is a blended market demand between B1b (R&D) and offices. If higher growth is achieved over the next two decades, then the current pipeline of supply is likely to be insufficient without further supply being made in the new plan.” [page 32] (Our emphasis)

“7.5 Proposed Approach: First Proposals development strategy – This section sets out the proposed option development strategy.” [page 69]

“Components of the Preferred Development Strategy ...” [page 70]

“Edge of Cambridge – Green Belt

“... sites in the Green Belt could provide a sustainable location for homes and jobs... However, *we do not consider that our housing needs alone provide the “exceptional circumstances” required in national policy to justify removing land from the Green Belt on the edge of Cambridge in the Local Plan...* having particular regard to:

- the scale of our housing and employment need in relation to existing supply
- the evidenced harm of releasing further land on the edge of Cambridge in the Green Belt as provided by the Cambridge Green Belt Study (August 2021), and
- the opportunities at other sustainable locations for development as set out in this outline preferred strategy, in particular at Cambourne, which responds to the opportunity to be provided by the proposed East West Rail station.” [page 72]

(Our emphasis)

“Drawing on this conclusion, *this source of supply (Edge of Cambridge – Green Belt) is not a significant focus for additional jobs and homes within the Greater Cambridge Local Plan preferred development strategy.* We have however, considered sites on the edge of Cambridge in the Green Belt on an individual basis to assess whether there could be any site specific exceptional circumstances that could justify release of land from the Green Belt. *In all but one case we do not consider that such exceptional circumstances exist.* (Our emphasis)

On the edge of Cambridge, on land currently within the Green Belt, our strategy proposes:

- a release of Green Belt at Cambridge Biomedical Campus - We think that there *may* be justification for exceptional circumstance for a limited release here to provide flexibility for this campus of international significance to continue to grow into the future, with potential to include an element of housing for its staff, whilst recognising the importance of the southern setting to Cambridge and the Gog Magog Hills. This location provides the opportunity to contribute to Green Infrastructure Strategic Initiative 3: Gog Magog Hills and chalkland fringe.” [Page 73]

“... *we consider there to be no exceptional circumstances for releasing land on the edge of Cambridge to meet development needs as a matter of principle and that spatial option was not preferred.* Consideration was given to whether there were any site specific exceptional

circumstances for releasing any particular site from the Green Belt and *only the Cambridge Biomedical Campus was identified as potentially being able to demonstrate such exceptional circumstances. All other sites on the edge of Cambridge in the Green Belt were not able to do so and are not preferred.*" [Page 87] (our emphasis)

"Part 2: Approach to site allocations supporting the preferred spatial strategy" ... [page 97]

"3. The edge of Cambridge" [page 113] ...

"S/CBC: Cambridge Biomedical Campus" [page 124]

"Evidence base

Greater Cambridge Employment Land Review 2020

As well as providing evidence regarding employment land needs and supply, the study explored issues related to the employment clusters in Greater Cambridge.

1.12 Life sciences is a key sector for the study area. Significant concentrations are found at Addenbrooke's Hospital and Cambridge Biomedical Campus on the southern edge of city. Further out, there are major centres across the south and south east of South Cambridgeshire including Babraham Research Campus, Wellcome Trust Genome Campus (Hinxton), Granta Park (Great Abington), Sagentia Research Park (Harston) and Melbourn Science Park. Other key hubs include Cambridge Research Park (Landbeach) to the north of the city, and St John's Innovation Park and Cambridge Science Park at the north east edge of Cambridge.

1.13 *Whilst there are benefits of connecting directly or being located close to research centres, there is also evidence of businesses operating successfully in new, accessible locations.* (Our emphasis)

1.14 The sector should continue to see growth. There are some local challenges to keeping up with demand for both wet and dry lab space, albeit there is additional floorspace coming forward including at the Genome Campus (Hinxton), Cambridge Biomedical Campus, Cambridge Science Park and Granta Park (Great Abington).

With regard to life sciences, it notes that:

3.10 Within this context, there are a number of notable concentrations. Most significant are Addenbrooke's Hospital and Cambridge Biomedical Campus on the southern edge of city; here, the prospect of a Cambridge South railway station is likely to be important in relation to future growth." [pages 125/6]

“Proposed Policy Direction and Reasons [page 126]

... An updated masterplan will be required for the Campus, to improve the overall experience of the site for workers and visitors. This should maximise opportunities to improve the “legibility” of the Campus by providing a network of cycle and pedestrian routes, high quality new public realm and open space, but in particular explore opportunities to enhance connections with the proposed Cambridge South Railway Station...

An additional area adjoining Babraham Road (S/CBC-A on the map) is identified as a potential area to be released from the Green Belt specifically to meet the long-term needs of the Campus. *Any release would be subject to the following: (Our emphasis)*

- Significant Green Belt enhancement in adjoining areas of White Hill and Nine Wells will be required, to provide green infrastructure and biodiversity improvements supporting the objectives of the Strategic Green Infrastructure Initiative 3: Gog Magog Hills and chalkland fringe. These areas would remain within the Green Belt, and are included in the Area of Major Change to highlight that green infrastructure and biodiversity improvements within this (sic) adjoining open areas must be an important element of future proposals.
- A comprehensive landscaping plan, including the delivery of new publicly accessible green space will need to be delivered, to create a soft green edge of the city, to minimise the urbanising effects of the development and help compensate for harm to the Green Belt.
- Design parameters regarding the scale and height of buildings will be established, to respond to the landscape and townscape of Cambridge.
- Development is dependent on the successful implementation of a Trip Budget approach, to ensure that the level of vehicle trips is limited to an appropriate level for the surrounding road network.
- *Development on the additional land will only be allowed to take place when evidence is provided that opportunities on the existing campus have been fully explored and utilised* before development takes place on the released land. (Our emphasis)
- Given the existing piecemeal development on the biomedical campus, any proposed release must contribute towards improving the wellbeing of campus users and surrounding communities, as well as addressing the spill over impacts on individuals and communities of this intensive employment location.

We therefore propose to address the Biomedical Campus area via the following existing and new sites:

New allocations

Sites for the potential future expansion of the Campus through this First Proposals Plan:

- S/CBC-A - Possible future expansion area adjoining Babraham Road

Continuing existing allocations

- S/CBC/Policy M15: Cambridge Biomedical Campus (including Addenbrooke's Hospital) - The main campus (Cambridge Local Plan 2018)
- S/CBC/Policy E/2: Cambridge Biomedical Campus Extension: Existing committed expansion (South Cambridgeshire Local Plan 2018)

Maps of these existing allocations can be found at the end of this document" [pages 126 & 127]

"Local Plan policies for the Cambridge Biomedical Campus

Guided by the Addenbrookes 2020 vision, and policies in recent Local Plans, the Campus has been evolving over the last 20 years. *However significant parts of the site are still under construction or development has not yet commenced.*

After its original Green Belt release, successive policies have sought to reserve the campus for uses that need to be located there. It is proposed that this approach continues." (Our emphasis) [page 130]

"Considering whether a Green Belt Release is justified

NPPF [National Planning Policy Framework] paragraph 140 requires that once established, *Green Belt boundaries should only be altered in exceptional circumstances*, where this is fully evidenced and justified, through the preparation or updating of plans. (Our emphasis)

The plan-wide approach to Green Belt is addressed at Appendix 1D: Greater Cambridge Local Plan Green Belt considerations. The following element of the topic paper seeks to consider if there are exceptional circumstances related to Cambridge Biomedical Campus, following a framework for assessing exceptional circumstances set out in the appendix referred to above." [page 130]

[TRA NOTE:

Given the significance of this issue, it is important to have the full text of national planning policy in mind:

"136. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation

or updating of plans. *Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.*

137. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”

(Our emphasis)

[National Planning Policy Framework. Ministry of Housing, Communities and Local Government. February 2019. Pages 40-41]

“Level of need and constraints on supply [page 131 of Development Strategy Topic Paper]

There remains (sic) large areas of the Campus which have yet to be built. Planning permission exists for 105,104m² of B1b (research and development), 66,561 D1 (clinical, health) on phases 1 and 2, comprising largely of the undeveloped land on the south side of the main Campus.

In addition, allocation was made in the South Cambridgeshire Local Plan 2018 for a further 8.9 hectares on the southern edge of the Campus, for biomedical and biotechnology research and development within class B1(b) and related higher education and sui-generis medical research institutes. Evidence submitted to the examination of that plan suggested this was capable of accommodating approximately 30,685m², although submissions by the

Cambridge Biomedical Campus as part of the Cambridge South proposal considers (sic) this may be capable of a significantly higher level of development.

The Campus is also considering the potential for new development within the core area of the site, for additional clinical and research space. They indicate this could deliver as much as 92,900m² floorspace. Take up of some of the remaining space is already planned, in the form of a new Cancer hospital, Children's Hospital and Addenbrooke's 3. There are also firms committing to further areas of phase 1, *but much of phase 2 and 3 of the site remains available.*

The rate of development on the Campus over the last 13 years equates to around 13,500m² per annum, which crudely would indicate a 21.8 year supply based on the available land described above. The Cambridge South - Building a World Leading Innovation District for the Life Sciences Report (Creative Places April 2021) submitted with the proposals considers there is around 12 years of remaining development capacity for research and R&D space and 20 years of clinical space capacity based on take up rates over this period. (Our emphasis)

Submissions from the Campus indicate that they expect demand to continue to grow rapidly. The Cambridge South - Building a World Leading Innovation District for the Life Sciences (Creative Places April 2021) Report states 'Abcam, AZ phase 1 and 1000 Discovery Drive add up to 900,000 sq ft, all to open within a 6 year period of 2018 to 2023. This 150,000 sq ft pa of take up would add up to 4.2m sq ft if it was consistently running through to 2050 at this level. We have sought to temper this and round down to 3m sq ft.', and for research, 'We assume a 30% increase on the rate of take up into the future, compared to the period since planning permission was granted for Phase 1 in 2008'.

They describe a snowball effect of increasing growth in the sector, and demand for space at CBC, and growing demand for firms to be in proximity to hospitals. *However, projecting forward past completions from short periods should be viewed with caution. It would assume that unusual events like AstraZeneca moving their national headquarters to Cambridge would take place on a regular basis.*

It is important that the site is not considered in isolation from the operation of the life sciences cluster in the Greater Cambridge area. The Greater Cambridge Employment Land Review (2020) indicates a strong supply of land for employment, including for research and development. There is existing land supply at locations including West Cambridge, North East Cambridge, Granta Park, and significant new development planned at Hinxtton Genome Campus. The Local Plan First Proposals Report also proposes further release of land at Babraham Research Campus, particularly suited to life sciences start-up companies.

Firms across a range of high technology research and development sectors are located in many locations across the Cambridge area, from central or edge of Cambridge sites, rural business parks, to village locations. Indeed, the biotech and pharmaceutical cluster stretches from Cambridge to (sic) south into South Cambridgeshire, Uttlesford District and beyond to Stevenage and London, known as the London Stansted Cambridge Corridor. Transport improvements planned by the Greater Cambridge Partnership will also be improving connections between places.

*Given the overall supply of employment land available, it is not considered that the case for release in this location can be made on the overall land supply. However, the benefits of the site in terms of its national importance to health care and life sciences needs to be acknowledged. There are likely benefits of colocation and in particular proximity to the hospital. [See TRA Comment below ***] A significant public investment is also taking place in the new Cambridge South Railway Station. Given the national importance of the site, it is considered that there may be a case for Green Belt release in this location. However, the Councils do not consider that there is sufficient evidence of a need to release land for the scale of development put forward in the promoters' Cambridge South proposal. This includes taking account the rate of build out on the exiting (sic) campus, and the remaining land supply within the site, along with the significant supply of employment land available in accessible locations elsewhere in the Greater Cambridge area.*

In terms of need of residential development, the First Proposals consultation sets out a proposed development strategy which would respond to the residential needs identified to 2041 and beyond. This focuses on areas outside the Green Belt. Areas committed and planned for development will have good access to the Campus by means other than the car. This includes the development proposed at North East Cambridge and Cambridge East."

(Our emphasis) [Pages 130-133]

*** [TRA comment:

The asserted benefits of colocation are not strongly evidenced for sectors which are well established such as the life sciences in Cambridge. Some may exist but at considerable public financial and environmental cost. See, for example, Greater Cambridge Employment Land and Economic Development Evidence Study, November 2020, paragraph 1.13, page 6: "Whilst there are benefits of connecting directly or being located close to research centres, there is also evidence of businesses operating successfully in new, accessible locations"; and this passage from the Development Strategy Topic Paper quoted at the top of this page: "Firms across a range of high technology research and development sectors are located in many locations across the Cambridge area ..." See also, David Plank, Cambridge Growth Beyond Reason. The Cambridge Commons – An Update. October 2020, pages 3-5: "My search of the scant literature left me unconvinced that the case for agglomeration asserted

so confidently by our Independent Economic Commission and others has been made, far from it...” Also, reasonable alternatives with significantly less environmental harm do exist – see Part Two of this Note.]

“The nature and extent of the harm to the Green Belt

In considering the impact on the Green Belt it is important to consider the nature and extent of the harm to Green Belt purposes. The Greater Cambridge Green Belt Study (2021) identifies that release of both areas identified in the Cambridge South proposal would result in very high harm to Green Belt purposes.

An area adjoining Babraham Road and north of Granham’s Road is identified in the study as having a lower level of harm, although this is still acknowledged as a high harm.” (Our emphasis)

[Page 133 of the Development Strategy Topic Paper]

“Extent to which Green Belt harm can be mitigated

The scale of the proposals mean that it would be challenging to mitigation (sic) the harm to the Green Belt of the promoters’ Cambridge South proposals.

Harm could potentially be reduced from the release of land from the Green Belt for the parcel north of Granhams Road identified by the councils, by the enhancement of existing hedgerows and woodland that forms (sic) the boundaries of the parcels, as well as the introduction of new woodland, particularly to the south-west and east. This would also ensure that development enhances existing landscape features and is in keeping with the wider rural character, in accordance with landscape guidelines set out in the Greater Cambridge Landscape Character Assessment.

NPPF paragraph 138 requires that when releasing land from the Green Belt plans should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. The councils have identified the areas around White Hill and the Nine Wells local nature reserve as providing an opportunity to do this.” [Page 133]

[TRA NOTE/COMMENT:

This assessment of harm to the Green Belt does not include consideration of the loss of high quality agricultural land which “the parcel north of Granham’s Road identified by the councils” would entail – which includes grades 2 and 3 land (confirmed in Greater Cambridge Planning Policy, Strategy & Economy Team email to TRA dated 15.11.2021). This is restricted by Local Plan Policy J/AL, “Protecting the best agricultural land”:

“Proposed policy direction

Restrict development which would lead to the irreversible loss of the best agricultural land (Grades 1, 2 or 3a) unless it is allocated in the Local Plan to meet development needs, or sustainability considerations and the need for the development are (sic) sufficient to override the need to protect the agricultural value of the land. In addition, the impact of development on soils and the protection of soil quality must be considered, through careful management during construction.”
[Greater Cambridge Local Plan First Proposals, page 235]

Nor does the assessment consider “all other reasonable options” to meet the Campus’s needs. As noted above, the National Planning Policy Framework states: “Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.” [Paragraph 137, page 40] Despite their acknowledgement of “the significant supply of employment land available in accessible locations elsewhere in the Greater Cambridge area” [page 132], the councils’ assessment does not include consideration of other available employment land sites. As this is a national policy requirement and other employment sites are available, its omission is a grave deficiency. Alongside other factors such as the assessment’s failure to include consideration of the loss of “the best agricultural land” which the proposal would entail, it undermines the councils’ provisional conclusion.]

The Development Strategy Topic Paper continues:

“Landscape and Townscape

The southern edge of Cambridge is a sensitive landscape. (Our emphasis)

It is considered that the development in the promoters’ Cambridge South proposals south of the Campus would:

- Result in the merging of the urban area of Cambridge with Babraham Park and Ride
- Encroach onto the slopes of the White Hill.

Their proposal between the M11 and the A1301 would:

- Reduce the separation between Shelford Road and the M11, and result in coalescence between Cambridge and Great Shelford.

A smaller development focusing on the area north of Granham’s Road as identified by the councils would have a lesser impact on the landscape, and in particular would:

- Avoid merging of development between Cambridge and Babraham Park and Ride, as this would create urban sprawl.

- Avoid encroachment onto the slopes of the White Hill, as development on the rising land of the Gog Magog Hills would substantially harm one of the key components of the setting of the city.
- Development would also need to be carefully designed, with detailed consideration of building heights and form, to avoid impacts on prominent views.
- Development would need to include substantial landscape mitigation to soften the effects of development. Mitigation should include the widening of existing hedgerows to between 25-30m and incorporate groups of large species and understorey planting. Significant landscaped areas should also be woven through the development to enhance biodiversity and health and well-being.”

[Pages 133-134 of the Development Strategy Topic Paper]

[TRA COMMENT:

The development proposed by the councils would clearly extend the edge of Cambridge city to Granham’s Road - and, alongside the as yet undeveloped extension taken out of the Green Belt in the current Local Plan (S/CBC/E/2), surround White Hill. It would also leave a small gap only between the new city edge and Babraham Park & Ride, making the remaining Green Belt in between vulnerable to further development. [Local Plan First Proposals, pages 88 & 340] Comparison of the red line land allocation to the CBC on the first map on page 340 – “S/CBC/Policy M15: Cambridge Biomedical Campus (including Addenbrooke’s Hospital)” with the red line allocation on the map on page 88 – “S/CBC, Map of proposed expanded Cambridge Biomedical Campus Area of Major Change” - illustrates the CBC’s growing encroachment on Green Belt open countryside at the edge of Cambridge between the 2006 Local Plan and the proposed new Plan; as well as its pronounced proximity to Nine Wells Local Nature Reserve – exacerbated by the planned route of the GCP’s Cambridge South East Transport, the prime purpose of which is to serve the growing travel needs of the CBC. This incremental erosion of our Green Belt, which Policy S/CBC would continue and aggravate, needs to stop.]

The Development Strategy Topic Paper continues -

“Biodiversity...

Proximity to the Nine Wells Local Nature Reserve is another important consideration. Like for other areas of the campus, specific measures will be needed to mitigate any adverse ecological impacts, in particular any potential for increased visitor pressures on Nine Wells LNR that may arise from the development. Measures will also need to be put in place to ensure no material adverse impact on the volume, pattern of flow or water quality of the chalk springs at Nine Wells, source of the Hobson’s Brook and Conduit.

... It is important that the development does not encroach onto the chalk slope of White Hill. These areas are important for biodiversity, and offer potential for enhancement such as chalk grassland creation. This could be achieved by restricting development to the area adjoining Babraham Road. A species-specific enhancement plan should be required, with a focus on species important in this area, such as the grey partridge. Proposed new habitat creation will require long term management plans that seek to balance biodiversity and recreational enhancement.” [page 135]

“Summary

Given the national importance of the site, it is considered that there may be a case for Green Belt release in this location. However, the Councils do not consider that there is sufficient evidence of a need to release land for the scale of development put forward in the promoters’ Cambridge South proposal. This includes taking account (sic) the rate of build out on the existing campus, and the remaining land supply within the site, *along with the significant supply of employment and residential land available in accessible locations elsewhere in the Greater Cambridge area.* The proposals would cause very high harm to the Cambridge Green Belt, and would also have significant negative impacts regarding landscape and biodiversity. The proposal put forward by the promoters and referred to as Cambridge South has not been included in the First Proposals. (Our emphasis)

However, the councils have identified a smaller area of land adjoining Babraham Road *as a potential area to be released from the Green Belt* specifically to meet the long-term needs of the Campus, subject to a number of criteria including the significant Green Belt enhancement in adjoining areas of White Hill and Nine Wells (sic) will be required, to provide green infrastructure and biodiversity improvements linking towards the Gog Magog Hills, noting that development at the Campus is at the fringes of the Greater Cambridge Strategic Green Infrastructure Initiative 3: Gog Magog Hills and chalkland fringe (see BG/GI: Green Infrastructure).” [page 136]

“Appendix 1D: Greater Cambridge Local Plan Green Belt considerations review [Page 204 of Development Strategy Topic Paper]

Introduction

This Green Belt Considerations Review informs consideration of sites proposed to the Greater Cambridge Local Plan process which are currently located within Cambridge Green Belt. Allocating them for development within the Plan would require justification of exceptional circumstances as set out in national policy.

The Review includes two sections:

- Exceptional circumstances review: Greater Cambridge-wide exploration
- Report of national planning policy steps followed to support a conclusion of exceptional circumstances

“Policy context

National policy

National Planning Policy Framework paragraphs 140-142 set out the following principles for land in the Green Belt:

- *Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified (140)*
- *Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:*
 - a. makes as much use as possible of suitable brownfield sites and underutilised land;
 - b. optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and...” (Our emphasis)

[TRA COMMENT:

It is important to note that this summary of national policy by the councils is incomplete - the full text is reproduced on pages 8-9 of this Note. National policy stresses the fundamental role of “strategic policies” in decisions to amend Green Belt boundaries: “Strategic policies should establish the need for any changes to Green Belt boundaries... “. [NPPF, paragraph 136] This is in stark contrast to the justification advanced by the councils in this one instance in the Green Belt on the edge of Cambridge - which is solely site-specific and in direct conflict with their strategic policy not to develop in the Green Belt on edge of Cambridge. This appears to be a misapplication of national policy.]

“Exceptional circumstances test taking approach from Calverton Parish Council v Greater Nottingham Council [Page 205 of the Development Strategy Topic Paper]

There is no definition of the national policy concept of "exceptional circumstances". The expression is broad and not susceptible to dictionary definition. As such, determination of exceptional circumstances is a matter of planning judgement.

In his High Court judgement regarding the case of Calverton Parish Council v Greater Nottingham Councils [2015], the Hon. Mr Justice Jay set out a number of matters that should be identified and dealt with in order to ascertain whether 'exceptional circumstances' exist to justify releasing land from the Green Belt:

- (i) The acuteness/intensity of the objectively assessed need (matters of degree may be important);
- (ii) The inherent constraints on supply/availability of land prima facie suitable for sustainable development;
- (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;
- (iv) The nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed): and
- (v) The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.

Drawing on the above, *this review uses the Calverton tests as a framework for considering exceptional circumstances in the context of the Local Plan*. Further to this, NPPF 141 establishes a series of additional steps to follow, which in themselves don't affect the exceptional circumstances test. (Our emphasis)

Exceptional circumstances review ...

Calverton tests at a Greater Cambridge-wide level

- (i) The acuteness/intensity of the objectively assessed need (matters of degree may be important); [page 206] ...

Taking the above aspects of housing need together, it is considered that *the overall objectively assessed need for homes is moderately acute. The need for affordable housing is very acute.*

*For jobs, the significant supply of employment land means that in quantitative terms there is not a very substantial need for additional land to be found in the new Plan. **With respect to jobs therefore it is not considered that the objectively assessed need is acute.***

(ii) The inherent constraints on supply/availability of land prima facie suitable for sustainable development; ...

We consider that a development strategy focused on the sites outside the Green Belt located on public transport corridors, in particular around Cambourne, is likely to provide an appropriate and sustainable alternative to locating development on the edge of Cambridge within the Green Belt... [page 207]

(iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt; ...

*Drawing on the above, while the acuteness of housing need is moderate, the inherent constraints on the supply of land within Greater Cambridge is (sic) very low, and as **such it is considered that in relation to meeting objectively assessed needs for jobs and homes, sustainable development is likely to be achieved in principle without impinging on the Green Belt.*** [Page 208]

(iv) The nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed)

Further to the above ***the Greater Cambridge Green Belt Assessment (2021) has shown that any release of Green Belt would result in harm.*** The study splits the Green Belt into parcels and provides an assessment of the contribution of each parcel to the Cambridge Green Belt purposes and the degree of harm if it was to be released for development.

(v) The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent

This is a site-specific test, not applicable to consideration of exceptional circumstances at a Greater Cambridge level.

Conclusion

Drawing on the above, it is considered that objectively assessed needs for homes and jobs are unlikely to justify exceptional circumstances to release land on the edge of Cambridge in the Green Belt for development, on the basis of the Calverton tests, subject to the findings of Appendix 1G: Greater Cambridge Local Plan Development Strategy Options – Summary Report Supplement. *As such we have considered site specific arguments for exceptional circumstances proposed on the edge of Cambridge.”* (Our emphasis throughout)

[Page 208]

“Consideration of site-specific arguments for exceptional circumstances...” [Page 208]

[TRA COMMENT:

The councils appear to have misapplied the Calverton Test by proceeding at this point to site specific considerations when they have established that at strategic, Greater Cambridge level there is no need for development in the Green Belt at the edge of Cambridge to meet employment or housing needs, other strategic development options being preferred. If Calverton tests (i) to (iv) are not satisfied at Greater Cambridge level, as the councils’ analysis shows they are not, site specific exceptions should not arise under the National Planning Policy Framework provision because the requirement that “Strategic policies should establish the need for any changes to Green Belt boundaries” has not been satisfied. [NPPF, Paragraph 136] Site specific considerations would only arise if tests (i) to (iv) were satisfied at Greater Cambridge level. Site specific considerations on their own are not sufficient to warrant use of Green Belt land if tests (i) to (iv) have not been satisfied at Greater Cambridge level. Proposed removal of this specific site from the Green Belt does not support the preferred spatial strategy. It contradicts it. Nor, as Part Two of this Note shows, do the facts of the situation justify the approach the two councils have taken on this matter.]

The Development Strategy Topic Paper continues -

“... 23 sites were submitted to the Call for Sites on the edge of Cambridge within the Green Belt. We completed a review of the arguments made by site promoters in relation to exceptional circumstances. Our conclusions following this review are as follows: ...

- 5 sites provided bespoke arguments for exceptional circumstances: ... (including)
 - o Land south of Addenbrooke's Road and east of M11, Cambridge South (Cambridge Biomedical Campus expansion) [TRA Note: *This is the landowners’ “Cambridge South” proposal*] – the site-specific argument for exceptional circumstances is explored further in Part 2: Approach to site allocations *supporting* the preferred spatial strategy ...”

[Page 209]

[TRA NOTE & COMMENT:

The relevant extracts from pages 136 & 73 of Part 2 of the Development Strategy Topic Paper are reproduced in the two paragraphs under “Summary” on page 15 of this note, and in the bulleted point in the last paragraph on page 5, which starts – “On the edge of

*Cambridge, on land currently within the Green Belt, our strategy proposes". Please refer to them as they are not repeated here. **These extracts are the only site-specific arguments made in the Development Strategy Topic Paper.***

It is difficult to see from these statements what the councils' case is for this sole proposed exception to their strategic conclusion not to develop in the Green Belt on the edge of Cambridge to meet employment or housing needs – a conclusion reached for the substantial reasons advanced in the Development Strategy Topic Paper. Yes, of course the CBC is of "international significance" and of "national importance", but as the basis for this sole proposed exception to the councils' strategic conclusion, it is insubstantial and unconvincing. Even more so when it would: cause "high harm" to the Green Belt in a highly sensitive position at the foot of the Gog Magog Hills adjoining Nine Wells Local Nature Reserve; lead to loss of scarce high quality agricultural land contrary to the two councils' own policy, a loss which is not considered in their assessment; "acute need" for development beyond the CBC's current boundaries within the period of the new Local Plan has not been demonstrated; and there are other reasonable options to hand.

The "other reasonable options" are addressed on the next page in Part Two of this Note.]

PART TWO

“other reasonable options”

This second part of the TRA’s Note & Comment identifies “other reasonable options” to meet the Cambridge Biomedical Campus’s needs – should there be a need for expansion beyond its approved allocations within the period of the new plan, of which the Association is not convinced (SEE extracts from Development Strategy Topic Paper, “Level of need and constraints on supply” on pages 9-11 of this note).

“Policy Context

“National Planning Policy Framework paragraphs 140-142 set out the following principles for land in the Green Belt:

“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.” (Our emphasis) [Development Strategy Topic Paper, page 204]

The full text of the relevant provision in the National Planning Policy Framework is given earlier in this note. [Pages 8-9]

In this instance the “identified need for development” is development of the Campus beyond its existing boundaries which include the further extension approved in the current Local Plan (S/CBC/Policy M15: CBC – The main Campus; & S/CBC/Policy E/2 CBC Extension: Existing committed expansion)

Examination of the two councils’ “Greater Cambridge Employment Land and Economic Needs Study”, particularly its “Appendix H: Summary of Land Availability in Greater Cambridge”, shows that *the two councils have not met this requirement*. The Study identifies a number of “other reasonable options” which the councils’ Local Plan First Proposals do not assess. These are:

Cambridge East

Appendix H, page 178, site 11

364 hectares

This site is the subject of Local Plan First Proposals Policy 13 (Development Strategy Topic Paper, page 113 et seq). The proposed policy direction states:

“The ... Local Plan will allocate land for a major new eastern quarter for Cambridge, enabling development of the airport site which was safeguarded for longer term development in the 2018 Local Plans:

- For approximately 7,000 homes, including affordable homes, and 9,000 jobs ... anticipated that around 2,900 homes will be delivered by 2041...
- Delivery of the full development will require the Greater Cambridge Partnership Cambridge Eastern Access Scheme Phase B to be in place which will provide high quality public transport connections...
[SEE “Cambridge Eastern Access Consultation Document, page 3: “Our (Greater Cambridge Partnership) proposals are for the provision of a new off-road busway across the current airport site...”. SEE also GCP “Making Connections” Consultation Document, “A New Bus Network”, sixth, seventh, and eighteenth to twenty sixth pages]
- The potential for... other connections by new public transport, cycling and walking links to centres of employment and other sustainable transport connections such as... North East Cambridge, Cambridge South Station *and Cambridge Biomedical Campus*, and Cambridge Station and the City Centre will be explored through the preparation of the draft Local Plan...
- A mix of employment uses, including offices, workshops and other uses, providing a variety of opportunities to support not only Cambridge’s high technology clusters, but also industry and creative uses...
- A new centre for retail, cultural and other uses that will serve the urban quarter and wider area...
- To retain a green corridor... as part of the Eastern Fens green infrastructure initiative...

Marshall has advised the Councils of its commitment to release the Airport related uses... advises that it has signed an option agreement at Cranfield Airport, Bedford... vacant permission is anticipated by 2030... a brownfield site...Delivery of homes and jobs would start post 2030...”

[Development Strategy Topic Paper, pages 113-116]

North East Cambridge

“... a compact city district on brownfield land already identified for development including a mix of jobs (helping to meet the identified need for offices and R&D employment floorspace) and homes to minimise trips.” [Development Strategy Topic Paper, page 71]

“Policy S/NEC

North East Cambridge will form an important part of the development strategy for the local plan. This edge of Cambridge site is one of the last few remaining significant brownfield sites within the city, where comprehensive redevelopment will support new homes and jobs as part of a new city district...

Once developed in full, which will extend beyond the Local Plan period of 2041, North East Cambridge is anticipated to deliver 8,350 new homes, 15,000 additional jobs as well as a wide range of necessary infrastructure to support the development including new schools, community and cultural facilities, open spaces as well as enhanced and new walking and cycling connections into and through the Area Action Plan area. This amount of development is predicated on the relocation of the existing Waste Water Treatment Works, a process being led by Anglian Water...

The North East Cambridge site is well served by public transport and active travel options, including Cambridge North Station and the Cambridgeshire Guided Busway. It is expected that this will improve further with a number of planned projects such as the Chisholm Trail, Waterbeach to Cambridge Public Transport Corridor and Waterbeach Greenway...

In March 2019, the government announced that the Cambridgeshire and Peterborough Combined Authority, working with Cambridge City Council, Anglian Water and other key partners, had been successful in securing £227 million from the Housing Infrastructure Fund (HIF) to relocate the Waste Water Treatment Plant off-site...

- Potential for early delivery from some of Chesterton Sidings parcel in 2026/2027 to 2029/2030 as pre-application discussions are already in progress (without prejudice to the outcome of any planning application process)
- other parcels anticipated to start delivering in 2030/2031 soon after the Water Treatment Plant has been relocated, with build out rates based on Housing Delivery Study assumptions for urban extensions of gradual increase in annual completions to maximum of 350 dwellings a year
- 3,900 dwellings anticipated in 2020-2041”

[Development Strategy Topic Paper, pages 99-101]

“National Planning policy requires local planning authorities to plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries...

The Strategy theme of this consultation proposes a range of sites and policies which are particularly suited to supporting the needs of clusters. These include significant opportunities at:

- North East Cambridge...”

[Jobs Topic Paper, page 14]

Station Road, Cambridge

“4 hectares. Partially developed employment site...The site is well established, providing quality office floor space.” [Appendix H, page 179, site 15]

Former Spicers Site, Sawston

“7.3 hectares ... Developed employment site, with vacant land... Planning permission for the development of commercial floorspace including 50,445 sqm B1b was granted in August 2020, and there is potential for future phases. The site... has the potential to create a cluster for future employment space.” [Appendix H, page 185, site 51]

Wellcome Trust Genome Campus, Hinxton

“27.9 hectares. Fully developed employment site. Major bioscience park ... South Cambridgeshire has resolved to grant permission for a mixed use application for 150,000 sqm of employment floorspace and this will likely respond to the short to medium term demand for laboratory and associated office floorspace.” [Appendix H, page 186, site 52]

Granta Park, Great Abingdon

“47 hectares... Employment site, with undeveloped phases... Major site, A11 access, well-established strategic employment site meeting the floorspace needs of the bioscience sector close to Babraham with a number of recently completed developments in B1b. A further outline unimplemented permission exists for 32,490 sqm for Phase 2.” [Appendix H, page 186, site 53]

Fulbourn Road West (Peterhouse Technology Park)

“8 hectares... Developed employment site, with vacant land... Large office/R&D site has a strong tech focus providing a mix of dry laboratory and office floorspace... The western part of the site was allocated for development in the Cambridge Local Plan 2018 (Site GB3 & GB4) Development is underway.” [Appendix H, page 184, site 43]

Land east of Peterhouse Technology Park

“6.9 ha...This greenfield land is an allocated employment site... anticipated to be developed in the medium term to accommodate demand for laboratory and office floorspace.”

[Appendix H, page 184, site 44]

A New Town Campus Option - Cambourne

Cambourne Business Park

“15.4 ha... Developed employment site, with vacant land... modern office buildings in a purpose-built campus with a range of professional services occupiers and flexible floorspace... planning permission for... B1... opportunities to respond to the demand for start-up office and potentially incubator floorspace.”

Cambourne West

“6.3 hectares. Greenfield.... A... mixed use site... Planning permission... development description includes: offices/light industry, use class B1 (up to 6.25ha). Employment areas targeted at small to medium sized operators will be provided in two locations... strategic location of the site...”

[Appendix H, pages 188/189, sites 62 & 63]

Camborne may be served by East West Rail. [“Making Meaningful Connections” Consultation Document, 2021, pages 16-17]

Other New Town Options

Waterbeach New Town

“13.8 ha... Greenfield and Brownfield... 8.8ha vacant...located with access to the strategic road network (A10) ...”

[Appendix H, page 182, site 33]

Northstowe

“7.05 ha...No employment floorspace has yet been completed within the new settlement...”

[Appendix H, page 181, site 29]

University Campus Options

North West Cambridge (Eddington)

“10 hectares. Greenfield... Part of the site is under construction for a new residential settlement with local retail, student accommodation and university associated floorspace. The developable land will support the expansion of the University by providing education and associated research and commercial floorspace. The planning permission... includes 100,000 sqm of research facilities including up to 40,000 sqm for research institutes and 60,000 sqm private research facilities linked to the University.” [Appendix H, page 189, site 66]

West Cambridge

“66 hectares. Developed employment site with vacant land. The site is subject to Cambridge Local Plan 2018 Policy 19 West Cambridge Area of Major Change... There are large amounts of open space on the site. A further application (undecided) has been submitted for major development to facilitate the implementation of the wider masterplan for the University across the site totalling 336,410 sqm including 170,000 sqm B1b commercial and 158,150 educational floorspace. Major University research and development expansion area supporting commercial R&D...” [Appendix H, page 190, site 70]

[TRA COMMENT:

“Other reasonable options” for meeting the Cambridge Biomedical Campus’s need for development do exist – as shown in the “Employment Land and Economic Needs Study” and in the new Plan’s development policies. These options were not assessed in the preparation of the new Local Plan Policy S/CBC, as National Planning Policy requires – nor have they been addressed by the Campus. They should be assessed by the two councils and the Campus, and proposed Policy S/CBC held in abeyance pending this review. These assessments should not start from the assumption that CBC development must be on land contiguous with the Campus’s existing land allocations. Other sites are suitable for CBC life science development. As, for example, the Development Strategy Topic points out:

“Whilst there are benefits of connecting directly or being located close to research centres, there is also evidence of businesses operating successfully in new, accessible locations.” [Source: Greater Cambridge Employment Land Review 2020, quoted in Development Strategy Topic Paper, page 125]

“Firms across a range of high technology research and development sectors are located in many locations across the Cambridge area, from central or edge of Cambridge sites, rural business parks, to village locations. Indeed, the biotech and pharmaceutical cluster stretches from Cambridge to (sic) south into South Cambridgeshire, Uttlesford District and beyond to Stevenage and London, known as the London Stansted Cambridge Corridor. Transport improvements planned by the Greater Cambridge Partnership will also be improving connections between places.”
[Development Strategy Topic Paper, page 132]

Successful collaborations in the life sciences exist between activities at a significant distance from each other. They do not have to be together at great cost to the Green Belt separation between Cambridge and its necklace of villages which successive local plans have stressed is key to Cambridge’s “special character”:

“2.51 The Green Belt preserves the unique setting and special character of the city ... (it) is one of the key elements that contribute to the symbiotic relationship between high quality of life, place and economic success of Cambridge...

2.53 Significant land was taken out of the Cambridge Green Belt in the 2006 Local Plan following strategic reviews...*This work has shown that the remaining areas of the Green Belt have increased in value* as they are now closer to the city’s edge and less Green Belt land remains to perform the unique roles played by the Cambridge Green Belt. The Green Belt is a critical environmental asset for Cambridge in forming the important setting for a compact, historic city and contributing to the high quality of life and place enjoyed here.” (Our emphasis)

[Cambridge City Local Plan 2018, pages 28 & 29]

Much of the land taken out of the Green Belt in the 2006 Local Plan was in the “Southern Fringe”. A significant proportion of this was for the Cambridge Biomedical Campus. Enough is enough. Other options exist which should be pursued to the exclusion of yet more land from the highly valued Green Belt that remains.]

The Association’s Conclusion is repeated on the next page.

Conclusion (repeated)

The need for another extension of the CBC within the period of the new Plan has not been established. The Plan period runs to 2041 and, at the rate of development over the last thirteen years, there is up to twenty-one years' supply available within the Campus's existing land allocations according to the two councils' assessment.

Removing this land would cause "high harm" to the Green Belt according to the councils' own assessment. The councils have not shown that there are exceptional circumstances which justify removal of the land, as national planning policy requires. Their preferred development strategy excludes development in the Green Belt as unnecessary as well as harmful. There is a surplus of employment land, and housing needs can be met without development in the Green Belt. It is doubtful that correct application of the "Calverton" legal test would uphold a case for exceptional circumstances where the councils' strategic conclusion is that development in the Green Belt for employment and housing purposes is not necessary and they prefer other strategic options for development in the new Plan. The councils and the Campus have not assessed the "other reasonable options" that exist to meet the Campus's needs, nor have the councils taken account of the irretrievable loss of high value agricultural land the proposal would entail, contrary to their own policy (J/AL). The site-specific justification for exceptional circumstances to allow development in the Green Belt on the edge of Cambridge in the sole instance of the Campus is insubstantial and unconvincing.

If it can be shown that there is a need for development of the CBC within the period of the new plan, "other reasonable options" do exist as the two councils' own employment land assessment shows – as listed in Part Two of this note.

Proposed Policy S/CBC should not be included in the new Plan unless the need for it within the period of the plan is clearly established AND all other reasonable options have been fully assessed and found wanting for good reason by the two councils and the CBC. The Association's conclusion is that such an assessment will identify reasonable options which would live up to and enhance the Campus's international reputation – and increase its contribution to Greater Cambridge rather than diminishing it, as use of yet more Green Belt land would do.

Successful collaborations in the life sciences exist between activities at a significant distance from each other. They do not have to be together at great cost to the Green Belt separation between Cambridge and its necklace of villages which successive local plans have stressed is key to Cambridge's "special character". Much of the land taken out of the Cambridge Green Belt in the 2006 Local Plan was in the "Southern Fringe", a significant proportion of which was for the Cambridge Biomedical Campus. Yet more land for the CBC was removed from the Green Belt in the current 2018 Local Plan. Enough is enough. Other reasonable options exist which should be pursued to the exclusion of yet more land from the greatly valued Green Belt that remains.

David Plank

For Trumpington Residents' Association, 11th March 2022

The question the Association asked at the Cambridge City Council South Area Committee meeting on 29 November 2021 was:

“Policy S/CBC Cambridge Biomedical Campus (CBC)”

The Association is strongly opposed to this policy as it is not the best way to meet the health and life sciences needs of the CBC. Why is the policy being proposed when

- It would cause “very high harm” to the Green Belt and would irretrievably damage high quality agricultural land - against both of which there is a presumption in the Local Plan and national planning policy
- It would reduce the gap between Cambridge and its necklace of villages which is essential to Cambridge’s “special character” according to the current Local Plan
- It would surround White Hill with development
- It would take Cambridge’s city edge out to Granham’s Road
- There is already “a large supply” of land allocated for economic development in the current Local Plan amounting to 135 hectares, with a number of sites suitable for the Campus’s needs identified in the Greater Cambridge Employment Land and Economic Needs Study Appendix H
- There is no guarantee that the CBC would not be back for more when the next Local Plan is prepared threatening the amalgamation of Great Shelford with Cambridge?”

DP/TRA, November 2021